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TIMOTHY B. FLEMING
OF COUNSEL

May 12, 2016

MEMO ENDORSED

**Corrected:
By ECF and facsimile**

The Honorable Frank Maas
United State Magistrate Judge
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570

Dear Judge Maas:

On behalf of the *Havlish* Plaintiffs, I respectfully request an extension of time for replying to the consolidated Opposition of the Plaintiffs in the *Ashton, Federal Insurance*, and *O'Neill* cases to our pending Motion For Creation of a Common Benefit Fund. The original due date is this coming Monday, May 16, 2016. In order to accommodate litigation schedules of counsel and the Memorial Day holiday, we request that the Court grant us leave until **Friday, June 3, 2016**, to file our Reply.

This letter comprises our first request for an extension of time in regard to this motion. No other deadlines are affected. This letter is meant to supplant and replace a letter motion previously submitted today that did not completely comport with your individual practices.

The undersigned has been authorized to advise the Court that the requested extension is acceptable to counsel for the Plaintiffs in the *Ashton, Federal Insurance*, and *O'Neill* cases.

Thank you very much. .

Respectfully Submitted,



Timothy B. Fleming
Attorney for the *Hoglan* Plaintiffs

**APPLICATION GRANTED
SO ORDERED**


Frank Maas, USMJ 5/12/16

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED

FILED: 5/12/16

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DELAND, FL
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